

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PATRICIA M. VARIEUR

Plaintiff

v.

BIS GLOBAL

Defendant.

Civil Action No. PX-16-3111

**REPLY TO “PLAINTIFF’S INITIAL REPLY TO DEFENDANT’S
MOTION TO QUASH AND MOTION FOR SANCTIONS”**

On October 26, 2016, reserving all rights and objections to service of process, jurisdiction, and venue, BIS Global, Inc., by and through its undersigned counsel, entered a special appearance (Dkt #7) for the purpose of moving to quash service and to dismiss the *pro se* Complaint (Dkt #1) on the grounds that the Defendant(s) had not been properly served, and that the Maryland defendant upon which Plaintiff appears to claim diversity jurisdiction no longer exists, having filed a certificate of cancellation in early 2015. *See* Motion To Quash Summons and to Dismiss Complaint, October 26, 2016 (Dkt #8).

On October 27, 2016, without filing an entry of appearance as required by Local Rule 102(1)(a)(i), a person who identifies himself as “Glenn Stephens Ph.D., Esq.,” who purports to act as an attorney but whose name is not in this Court’s on-line data base of Bar Members, filed an electronic pleading, ostensibly on behalf of the Plaintiff, captioned “Plaintiff’s Initial Reply to Defendant’s Motion to Quash And Motion for Sanctions” (Dkt #9). In addition to failing to enter his appearance as required by Local Rule 102(1)(a)(i), Mr. Stephens did not include any “bar number assigned by this Court,” as required by Local Rule 102(1)(b)(i).

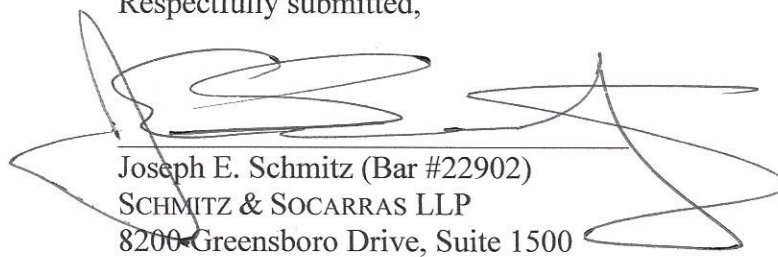
This is not the first time Mr. Stephens has tried improperly to file a pleading in this matter. On October 21, 2016, the Court issued a "Return Pleading Order" (Dkt #5), in which the Court advised Mr. Stephens that, "The Clerk received your Complaint Supplement on September 23, 2016; however, it is deficient in the area(s) checked below and is being returned to you, at the direction of the presiding judge." The deficiency "checked below" indicated: "All documents filed by counsel must be filed using CM/ECF (pacer.gov)." Mr. Stephens has not re-filed his September 23, 2016, "Complaint Supplement . . . using CM/ECF (pacer.gov)."

Accordingly, BIS Global, Inc., urges the Court to strike Mr. Stephens' "Initial Reply" (Dkt #9) on grounds that Mr. Stephens has not filed an entry of appearance as required by Local Rule 102(1)(a)(i), his name is not in this Court's data base of Bar Members, and he failed to include a "bar number assigned by this Court" on his "Initial Reply" (Dkt #9), as required by Local Rule 102(1)(b)(i) for "all court documents."

Finally, as the Motion to Quash Summons and to Dismiss Complaint (Dkt # 8) has not been opposed by either the *pro se* Plaintiff or by any properly noticed Member of the Bar of this Court on behalf of Plaintiff, BIS Global, Inc., respectfully urges the Court to quash the Summons and to dismiss the Complaint forthwith.

Respectfully submitted,

November 14, 2016



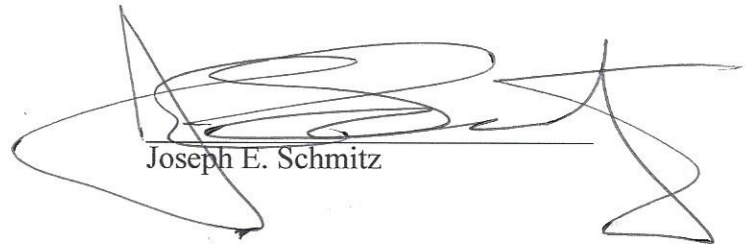
Joseph E. Schmitz (Bar #22902)
SCHMITZ & SOCARRAS LLP
8200 Greensboro Drive, Suite 1500
McLean, Virginia 22102

Counsel for BIS Global, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Reply to what is captioned "Plaintiff's Initial Reply to Defendant's Motion to Quash And Motion for Sanctions" (Dkt #9) was filed electronically through CM/ECF, and, as the person who filed this "Plaintiff's Initial Reply" has not entered his appearance as counsel for Plaintiff, the foregoing Reply has also been served upon the Plaintiff via U.S. Mail addressed as follows on November 14, 2016:

Patricia M. Varieur
25123 Sweetspire Square
Aldie, VA 20105



Joseph E. Schmitz